

Online Privacy Statement

Effective Date: [\[insert effective date\]](#)

Children's Medical Center Health Plan is concerned about your privacy and wants you to be familiar with how Children's Medical Center Health Plan, Inc. (the "Plan", "we", "us" or "our"), collects, uses, and discloses information. Please review it carefully.

This Privacy Statement describes our practices in connection with information that we collect through the websites, software applications, and other online properties and services operated by us solely in the United States from which you are accessing this Privacy Statement (collectively, the "Sites"), except for any information that is protected health information ("PHI") under the Health Insurance Portability and Accountability Act ("HIPAA"). Any collected information that is PHI is governed by, and will be used and disclosed solely as permitted by the Plan's Notice of Privacy Practices [\[insert hyperlink\]](#). For more information about the privacy of PHI, please refer to the Plan's Notice of Privacy Practices [\[insert hyperlink\]](#).

The Plan reserves the right to change or modify this Privacy Statement at any time. If we make changes to this Privacy Statement, we will provide notice of such changes, by sending an email notification, providing notice through the Sites, or updating the "Last Updated" date at the beginning of this Privacy Statement. We encourage you to review this Privacy Statement whenever you use or access the Sites or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

Collection of Information

Information You Provide Us

We collect information you provide directly to us. For example, we collect information when you: create an account or profile; use the interactive areas and features of the Sites; request customer support or otherwise communicate with us.

"Personal Information" is information, such as your name and address, or other information that identifies you as an individual or relates to an identifiable person. We collect personal

information that you voluntarily provide through the Sites, including account registration information.

Information We May Collect Automatically

When you access or use the Sites, the types of information we may automatically collect about you include:

- a) **Log Information:** When you visit the Sites, our servers may automatically record certain log file information, such as your Internet Protocol (“IP”) address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Sites.
- b) **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers may use various tracking technologies, including cookies and web beacons, to collect information about you when you interact with our Sites, including information about your browsing and purchasing behavior. Cookies are small data files stored on your hard drive or in device memory that help us improve the Sites and your experience, see which areas and features of the Sites are popular, and count visits. Web beacons are electronic images that may be used in the Sites or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see “Your Choices” below.

Information We Collect From Other Sources

We and our service providers may collect Personal Information in a variety of ways, including:

- a) **Through the Sites:** We may collect Personal Information through the Sites, e.g., when you register for an account.

Use of Information

We may use information about you for various purposes, including to:

- a) Provide, maintain, and improve the Sites;
- b) Provide you with information about health care and health related services, resources and benefits;
- c) Send you related information, including confirmations, updates, technical notices, security alerts and support and administrative messages;
- d) Monitor and analyze trends, usage and activities in connection with the Sites;
- e) Respond to your comments, questions and requests and provide customer service;
- f) Complete transactions, for example, processing your insurance payments, or processing claims;

- g) Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Plan and others;
- h) Link or combine with information we get from others to help understand your needs and provide you with a better experience; and
- i) As we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Statement:

- a) To our third-party service providers who provide services such as online patient portals, website hosting, data analysis, payment processing, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services;
- b) To subsidiary and affiliated entities that we control, that control us, or that are under common control with us;
- c) With your consent or at your direction; and
- d) As we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. Any additional disclosures for which you provide consent.

We also may share aggregated or de-identified information, which cannot reasonably be used to identify you.

Security

The Plan takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to or from us over the Internet. In particular, email sent to or from the Sites

may not be secure, and you should therefore take special care in deciding what information you send to us via email.

Your Choices

Account Information

You may update, correct or modify information about you at any time by logging into your online account or by emailing us at [insert email address]. If you wish to deactivate your account, please email us at [insert email address], but note we may continue to store information about you as required by law or for legitimate business purposes.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Sites.

Using Third-Party Analytics Providers

We may use a third party web analytics service provider to analyze how users use the Sites, compile statistical reports on Sites activity, and provide other services related to the Sites.

Contact Us

If you have any questions about this Privacy Statement, please contact us at:

Children's Medical Center Health Plan
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